

IN THE UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION

Civil Action No. 4:14-cv-00131-WTM-GRS

DANIEL DEFENSE, INC., )

Plaintiff, )

v. )

REMINGTON OUTDOOR COMPANY, )  
INC., AKA FREEDOM GROUP, INC. and )  
REMINGTON ARMS COMPANY, LLC )  
DBA DPMS FIREARMS/PANTHER )  
ARMS, )

Defendants. )  
\_\_\_\_\_ )

**CIVIL ACTION NO.  
4:14-cv-00131-WTM-GRS**

**ANSWER OF PLAINTIFF/COUNTERCLAIM DEFENDANT DANIEL DEFENSE TO  
DEFENDANT REMINGTON ARMS COMPANY, LLC'S COUNTERCLAIM.**

For its answer to the Defendant Remington Arms Company, LLC's Counterclaim, the Plaintiff/Counterclaim Defendant Daniel Defense, Inc. ("Daniel Defense") admits only as much as may be specifically admitted herein and further states and alleges as follows:

**PARTIES**

1. Admitted.
2. Admitted.

**JURISDICTION**

3. Admitted.
4. Admitted.

**VENUE**

5. Admitted.

**FACTS**

6. Admitted.

7. Admitted.

8. Daniel Defense is without information sufficient to determine the truth or falsity of the allegations in Paragraph 8, and therefore denies same.

9. Denied.

10. Denied.

11. Denied.

**COUNT I**  
**DECLARTORY JUDGMENT OF TRADEMARK NON-INFRINGEMENT**

12. This paragraph does not contain any claim for relief or facts in support of a claim to which a response is required.

13. Admitted.

14. Denied.

15. Denied.

16. Denied.

17. Denied.

18. Denied.

**COUNT II**  
**CANCELLATION OF TRADEMARK REGISTRATION NOS. 4,079,660 AND 4,469,889**

19. This paragraph does not contain any claim for relief or facts in support of a claim to which a response is required.

- 20. Denied.
- 21. Denied.
- 22. Denied.
- 23. Denied.
- 24. Denied.
- 25. Denied.
- 26. Denied.
- 27. Denied.

**PRAYER FOR RELIEF**

Daniel Defense denies that Remington Arms Company, LLC is entitled to any relief whatsoever.

This the 17<sup>th</sup> day of November, 2014.

/s/ Justin Charles Ward  
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/s/ Robert M. Ward  
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*Attorneys for Plaintiff Daniel Defense, Inc.*

**CERTIFICATE OF SERVICE**

I do hereby certify that this 17<sup>th</sup> day of November, 2014, I served a copy of the foregoing **ANSWER OF PLAINTIFF/COUNTERCLAIM DEFENDANT DANIEL DEFENSE TO DEFENDANT REMINGTON ARMS COMPANY, LLC'S COUNTERCLAIM** in accordance with the notice of electronic filing requirements on:

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